State of New Jersey
DEPARTMENT OF ENVIRONMENTAL PROTECTION
SITE REMEDIATION AND WASTE MANAGEMENT PROGRAM
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Commissioner

July 20, 2021

Sam Abdellatif
Land and Redevelopment Programs Branch
U.S. Environmental Protection Agency, Region 2
290 Broadway, 25th. Floor
New York, NY 10007-1866

RE: Amerada Hess Corp- Former Port Reading Refinery
EPA ID No. NJD045445483
750 Cliff Road
Woodbridge Twp, Middlesex County
PI#: 006148

Comment Letter: 11/17/2020 Response to SI Comment Letter (12/6/2018)

Dear Mr. Abdellatif:

The New Jersey Department of Environmental Protection (Department) has completed a review of the 11/17/2020 Response to SI Comment Letter (12/6/2018) submitted February 17, 2021. The documents were submitted pursuant to the Site Remediation Reform Act (N.J.S.A. 58:10C-1 et seq.), the Administrative Requirements for the Remediation of Contaminated Sites (N.J.A.C. 7:26C), and the NJDEP Technical Requirements for Site Remediation at N.J.A.C. 7:26E.

The Department has the following comments:

NJDEP Comments & Earth Systems/Hess Responses:

Response 4 is accepted.

NJDEP Comments & Earth Systems/Hess Responses:

Earth Systems/Hess Response 1: Future quarterly reports will include additional scheduling information particularly for AOC 11a (Administration Building), AOC 57 (Day Tank Field), and other LNAPL areas/high dissolved COC areas identified in the SIR review. The response is accepted, and future quarterly report and CID information will be considered.

Earth Systems/Hess Response 2A (bullet 3 – additional analyses): Clarification was requested on what other analyses could be needed besides TCL VOC/SVOC, TAL metals, EPH, general chemistry, and TICs, and select areas for PCB.

The Department's September 27, 2016 – Section 7 review of the 2015 SIR identified that there may be COCs that were part of petroleum processing, wastes, and/or wastewaters that may not be characterized by standard remedial investigation analyses. Consistent with N.J.A.C. 7:26E-2.1(c)1, the responsible party is required to ensure that analyses reflect the potential COCs in an area of concern. The Department considered the potential for additional analytical methods to be applicable to former petroleum processing, waste/wastewater management areas and/or systems, gasoline additives and alcohol areas. AOC 14a and 14b was identified as an AOC due to gasoline additives storage (e.g., TBA, MTBE, TAME) and any other additives, as well as the storage of methanol and petroleum processing materials (raffinate, sour water) identified in the 2006 SIR/RIW.

The Department has already identified the analytical methods for alcohols for methanol and/or ethanol transfer and storage areas (USEPA Method 8015B-direct injection) and PFAS for the firefighting training/storage areas (USEPA Method 537 – modified) as applicable to some areas of the facility where a release may not or will not be characterized by TCL VOC/SVOC + TICs. 1,4-dioxane investigation sample analyses need to consider the SW-846 USEPA Method 8270 SVOC SIM (selected ion monitoring) with isotope dilution GC/MS (https://14d-1.itrcweb.org/wp-content/uploads/2020/05/Sampling-and-Analysis-Final.pdf - see Table 2) to achieve the GWQS of 0.4 ug/L. Any other potential process related raw materials and/or waste/wastewater constituents need to be considered in determining analytical methods to characterize site impacts from a release.

Earth Systems/Hess Response 2E: The question was if specific information on materials storage outside of AOC 5 could not be located in facility records, what characterization sampling would be necessary.

Materials storage outside of AOC 5 will need to be characterized pursuant to N.J.A.C. 7:26E-2.1(c)1 (below). One specific Department concern was whether materials stored outside of AOC 5 included materials waiting to be placed within AOC 5, e.g., catalyst fines. Characterization sampling of COCs associated with materials staged outside of AOC 5 will help in the investigation of ground water, and AOC 12 surface water, sediment, and ecological investigations.

> "N.J.A.C. 7:26E-2.1(c):
>
> (c) The following requirements apply for selection of analytical parameters for all environmental media:
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> 1. Samples for all environmental media shall be analyzed for:
>
> i. The contaminants that may be present as determined during the preliminary assessment and/or from any other information obtained during the remediation; or

ii. The Target Compound List plus TICs/Target Analyte List (TCL + TICs/TAL), hexavalent chromium, extractable petroleum hydrocarbons (EPH), and pH when contaminants are unknown or not well documented;"

Earth Systems/Hess Response 3A: All AOC investigations will comply with the NJDEP Technical Requirements for Site Remediation at N.J.A.C. 7:26E. The response is accepted.

Nothing in this correspondence affects Hess' potential liability and obligations to the State Trustee, the Department, or its Commissioner regarding natural resource injuries, restoration, or damages.

If you have any questions regarding this matter, contact Julia Galayda at Julia.Galayda@dep.nj.gov.

Sincerely,

Gwen B Zervas

Gwen B. Zervas, P.E.
Section Chief

Cc: Julia Galayda, Case Manager
John Virgie, LSRP, Earth Systems
Ann Charles, BEERA
Jill Monroe, BGWPA